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8 Attorneys for United States of America

9 UNITED STATES DISTRICT COURT

10 NORTHERN DISTRICT OF CALIFORNIA

11 SAN JOSE DIVISION

12 UNITED STATES OF AMERICA,) NO. 5:23-CR-00354-PCP
13 Plaintiff,)
14) NOTICE OF RELATED CASE IN A CRIMINAL
15 v.) ACTION
16 RAJIV AGNIHOTRI,)
17 Defendant.)
18 _____)

19 UNITED STATES OF AMERICA,) NO. 5:24-CR-00459-EKL
20 Plaintiff,)
21 v.) NOTICE OF RELATED CASE IN A CRIMINAL
22 JOANNE MARIAN SEGOVIA,) ACTION
23 Defendant.)
24 _____)

25 Pursuant to Local Criminal Rule 8-1(a), the United States of America hereby notifies the Court
26 that the two above-captioned criminal cases might be related.

27 In case no. 5:23-CR-354-PCP, defendant Rajiv Agnihotri was charged on October 11, 2023 with
28 fifteen counts for conspiracy to distribute controlled substances and unlawful importation of various

1 controlled substances, including Zolpidem, Alprazolam, Lorazepam, Tapentadol, and Tramadol, in an
2 Indictment (ECF No. 1). Defendant Agnihotri pleaded guilty to those charges on July 3, 2024 (ECF
3 No. 31). He was detained on January 1, 2025 (ECF No. 54), and is currently in custody awaiting
4 sentencing.

5 In case no. 5:24-CR-00459-EKL, defendant Joanne Marian Segovia was originally charged on
6 March 27, 2023 by Criminal Complaint (ECF No. 1), and then on charged on August 12, 2024 with one
7 count of unlawful importation of a controlled substance, Tapentadol, by an Felony Information (ECF
8 No. 55). Defendant Segovia pled guilty to that charge on October 8, 2024 (ECF No. 58) pursuant to a
9 plea agreement. She was sentenced on January 21, 2025 (ECF No. 64), to 3 years of probation with 100
10 hours of community service; \$100.00 special assessment.

11 The informs the Court that cases might be related within the meaning of Local Rule 8-1(b)(2).
12 Specifically, defendant Agnihotri imported various controlled substances as specified in his Indictment
13 from a criminal network in India that called itself “Durgapura pharmacy,” and then distributed those
14 controlled substances throughout the United States. During the government’s investigation of defendant
15 Agnihotri’s conduct, the government learned that defendant Agnihotri had distributed controlled
16 substances to defendant Segovia. Further investigation by the government into defendant Segovia then
17 revealed that she also was in contact with one of defendant Agnihotri’s sources in India, separately from
18 Agnihotri, and that defendant Segovia directly received controlled substances from that source in India
19 for her own personal use and to distribute them within the United States. This relationship between the
20 defendants was set out in further detail in the Government’s Sentencing Memorandum (ECF No. 62)
21 that was filed on January 14, 2025 in defendant Segovia’s case. That Memorandum also noted
22 defendant Agnihotri’s case as co-pending and awaiting sentencing at that time.

23 It is the government’s position that the two defendants are not similarly situated. Accordingly,
24 the government intends to make a different sentencing recommendation for defendant Agnihotri than it
25 did for defendant Segovia based on the factors set forth in 18 U.S.C. § 3553(a). Nevertheless, if the
26 Judge who sentences defendant Agnihotri is different than the Judge who sentenced defendant Segovia,
27 then there might be duplication of efforts by those different Judges regarding (1) any fact finding
28 pertaining to how controlled substances were imported and distributed by these two defendants, and

1 (2) the sentencing guidelines calculations that results from the converted drug weights of those
2 controlled substances, which include counterfeit prescription medications, pursuant to U.S.S.G.
3 § 2D1.1(c).

4 DATED: July 23, 2025

Respectfully submitted,

5 CRAIG H. MISSAKIAN
6 United States Attorney

7 /s/

8 DANIEL N. KASSABIAN
9 Assistant United States Attorney

10 2068-0770-3812, v. 1

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